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Atorneys for Defendant
GOLDEN STATE WARRIORS, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ELLIOTT LAM, individually and on behalf of all others similarly situated,

Plaintiff,

V.

SAM BANKMAN-FRIED, CAROLINE ELLISON, and GOLDEN STATE WARRIORS, LLC.

Defendants.

CASE NO. 3:22-CV-07336-JSC

Related Cases: 3:22-cv-07444-JSC
3:22-cv-07620-JSC
3:22-cv-07666-JSC
3:23-cv-00024-JSC
3:23-cv-00667-JSC
3:23-cv-00669-JSC
3:23-cv-00670-JSC

**STIPULATION AND [PROPOSED]
ORDER REGARDING RESPONDING
TO THE COMPLAINT**

Judge: Hon. Jacqueline Scott Corley

Pursuant to Civil Local Rule 6-1(a), Plaintiff ELLIOTT LAM and Defendants SAM BANKMAN-FRIED and GOLDEN STATE WARRIORS, LLC, by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, on November 21, 2022, Plaintiff Elliott Lam (“Lam” or “Plaintiff”) filed a putative class action complaint in this Court asserting claims pursuant to California’s Unfair Competition Law, Cal. Bus. & Prof. Code § 17200, *et seq.*, California’s False Advertising Law, Cal. Bus. & Prof. Code § 17500, *et seq.*, as well as claims for Fraudulent Concealment, Civil Conspiracy, and Declaratory Judgment, against Defendants Sam Bankman-Fried, Caroline Ellison, and Golden State Warriors, LLC (“GSW”) (Dkt. 1, hereinafter the “Lam Complaint”);

WHEREAS, waivers of service have been filed in *Lam* for Defendants Sam Bankman-Fried and GSW (collectively, “Served Defendants”) (Dkts. 33-34) and service is forthcoming for Defendant Ellison;

WHEREAS, Plaintiff filed an Administrative L.R. 7-11 Request for an Order Continuing Case Management Conferences in this case and other related actions (*See* Dkt. 41);

WHEREAS, as noted in Plaintiff’s March 24 Administrative Request, the Judicial Panel for Multidistrict Litigation (“JPML”) is expected to hear the FTX MDL petition at its next hearing on May 25, 2023 (*See In re: FTX Cryptocurrency Exchange Collapse Litig.*, MDL No. 3076);

WHEREAS, on March 28, 2023, the Court issued an order granting Plaintiff’s request to continue the case management conference and set the case management conference for this matter and the related actions for May 26, 2023 (*See* March 28, 2023 Order, Dkt. 42);

WHEREAS, in light of the Court’s March 28 Order and the upcoming JPML hearing, and pursuant to United States District Court for the Northern District of California Civil Local Rule 6-1(a), Plaintiff and Served Defendants stipulate to an extension to the deadline for Served Defendants’ responsive pleading after service of the Complaint;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Served Defendants, through their undersigned counsel, subject to the approval of the Court, as follows:

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1 1. Served Defendants' deadline to respond to the Lam Complaint is continued until thirty (30)
2 days following an order by the JPML regarding the issues of potential centralization and transfer in
3 MDL No. 3076.

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5 Stipulated and agreed to on this 3rd day of April, 2023 by:

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7 Attorneys for Defendant
GOLDEN STATE WARRIORS, LLC

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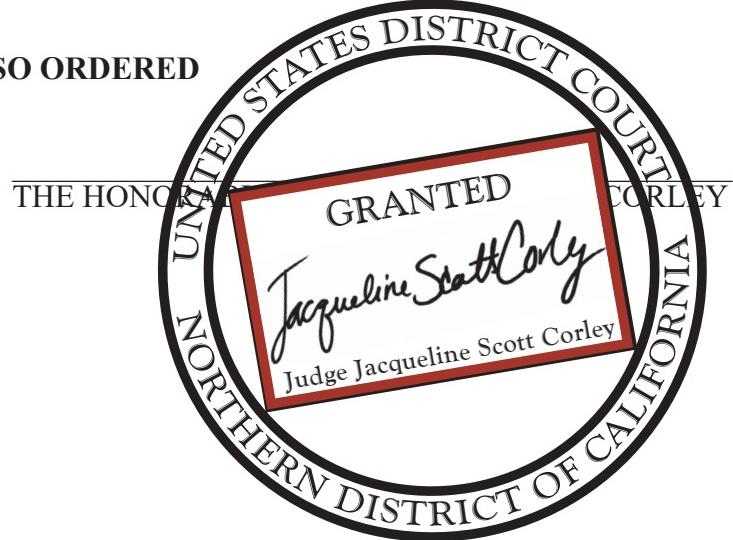
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14 PURSUANT TO STIPULATION, IT IS SO ORDERED
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16 Dated: April 4 , 2023
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18 **Declaration Pursuant to L.R. 5-1(h)(3)**
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In accordance with Local Rule 5-1(h)(3), the filing party has obtained concurrence from the other parties regarding filing of this stipulation and electronic signature on their behalf.